

KRIEGER KIM & LEWIN LLP

500 Fifth Avenue
New York, NY 10110

Telephone: (212) 390-9550
www.KKLlp.com

March 18, 2021

By ECF

The Honorable Raymond J. Dearie
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *United States v. Jose Carlos Grubisich, 19 Cr. 102 (RJD)*

Dear Judge Dearie:

We write on behalf of Mr. Jose Carlos Grubisich to respectfully request that the Court allow the parties until on or before March 23, 2021 to advise the Court regarding the status of the case and to make a request for the scheduling of a status conference or other hearing. The government consents to this request. The parties remain engaged in discussions regarding a potential resolution of this case and expect to be in a position to provide an update to the Court early next week.

On March 4, 2021, the Court adjourned *sine die* the status conference scheduled for March 5 and ordered the parties to provide an update on the status of the case by March 15. *See* March 4, 2021 Electronic Order. In written correspondence, the parties and Court personnel subsequently agreed to extend that deadline. During the last status conference on November 9, 2020, the Court excluded time under the Speedy Trial Act until July 19, 2021. *See* November 9, 2020 Minute Entry.

Respectfully submitted,

By: /s/ Edward Y. Kim

KRIEGER KIM & LEWIN LLP
500 Fifth Avenue, 34th Floor
New York, New York 10110
Tel.: (212) 390-9550
Edward.Kim@KKLlp.com
Henry.Ross@KKLlp.com

BRACEWELL LLP
1251 Avenue of the Americas, 49th Floor
New York, New York 10020
Tel.: (212) 508-6100
Paul.Shechtman@Bracewell.com

Attorneys for Jose Carlos Grubisich

cc: All counsel of record